## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. M-19-2440
	§	
	§	
JUAN P. GALINDO	§	

## **DEFENDANT'S REQUESTED VOIR DIRE**

## TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant, through Counsel, and requests This Honorable Court propound the following questions to the venire during voir dire:

- 1. The defendant in this case is an officer for the San Juan Police Department. Is there anything about his employment with the San Juan PD that would prevent you from rendering a fair and impartial verdict in this case?
- 2. Has anyone heard or seen media reports on TV or in the newspapers about the Defendant? If so, is there anything about such media reports that would prevent you from rendering a fair and impartial verdict in this case?
- 3. Have you, or someone close to you, ever helped support or advocate in favor of or against police reform, such as the movement to "defund the police"? If so, would your support for or against police reform prevent you from rendering a fair and impartial verdict in this case?
- 4. Have you, or someone close to you, ever been arrested for a crime and thought that the police did not handle the arrest professionally? If so, would such experience prevent you from rendering a fair and impartial verdict in this case?
- 5. Does anyone here not trust the police in general? If so, would such general distrust of police prevent you from rendering a fair and impartial verdict in this case?

Respectfully submitted,

REYNALDO M. MERINO

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/s/ Reynaldo M. Merino Reynaldo M. Merino SBN: 13953250 Federal I.D.: 19865

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing DEFENDANT'S REQUESTED VOIR DIRE has been delivered to the U.S. Attorney's Office via electronic mail on August 12, 2022.

/s/ Reynaldo M. Merino Reynaldo M. Merino